

1 THE HONORABLE JOHN C. COUGHENOUR
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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 INNOVATIVE SOLUTIONS
11 INTERNATIONAL, INC., a Washington
corporation,

12 Plaintiff,

13 v.

14 HOULIHAN TRADING CO., INC., a
15 Florida corporation; BRIGHTON GROUP,
16 LLC, an Arkansas limited liability company;
17 MARCUS TECHNOLOGIES LLC, a Texas
18 limited liability company; SHUMAKER
19 INTERNATIONAL CORP., a Tennessee
corporation; COOK INTERNATIONAL
20 TRADE & BROKERAGE, INC., a Florida
corporation; NORTH SOUTH FOODS
GRP., INC., a Florida corporation;
HENLEY'S WHOLESALE MEATS, INC.,
an Arkansas corporation; PILGRIM'S
PRIDE CORP., a Delaware corporation; and
DOES 1-10,

21 Defendants.

Case No. 2:22-cv-00296-JCC

22 PARTIES' AMENDED DESIGNATED
23 DEPOSITION TRANSCRIPTS

1 Innovative Solutions International, Inc., Houlihan Trading Co. Inc., and Pilgrim's Pride
 2 Corp. respectfully submit the attached amended designated deposition transcripts. The parties
 3 previously designated deposition transcripts on March 29, 2023 (Dkt. No. 261), before the trial
 4 date in this matter was continued. Trial is now scheduled for December 2, 2024. In light of the
 5 Court's rulings on the parties' motions in limine and subsequent conferrals between the parties
 6 regarding certain witnesses' attendance at trial, the parties are withdrawing certain deposition
 7 transcripts and amending certain transcripts, as indicated below. Overall, the volume of
 8 designations and objections thereto have been substantially reduced.

9 **I. WITHDRAWN TRANSCRIPTS**

10 The parties withdraw the following deposition transcripts on the understanding that the
 11 listed witnesses will be available to testify in-person at trial:

12 Witness	13 Previous Location
14 Alice Craft-McLaughlin (Fed. R. Civ. P. 30(b)(6))	Dkt. No. 261, Ex. 1
15 Alice Craft-McLaughlin	Dkt. No. 261, Ex. 2
16 Tanner Lipsey	Dkt. No. 261, Ex. 7
17 Santiago Tinoco	Dkt. No. 261, Ex. 11
18 Alana Wright	Dkt. No. 261, Ex. 12

19 **II. RESUBMITTED/AMENDED TRANSCRIPTS**

20 The parties resubmit the below deposition transcripts with amended designations, which
 21 supersede the parties' previously submitted deposition designations. The designated transcripts
 22 include all parties' designations, counter designations, objections, and responses to objections.

23 Witness	24 Exhibit Number
25 Dan Cook (Fed. R. Civ. P. 30(b)(6))	Ex. 1

1	Witness	Exhibit Number
2	Bryan Griggs (Fed. R. Civ. P. 30(b)(6))	Ex. 2
3	Mike Henry (Fed. R. Civ. P. 30(b)(6))	Ex. 3
4	Cara Huntsman (Fed. R. Civ. P. 30(b)(6))	Ex. 4
5	Billy Marcus (Fed. R. Civ. P. 30(b)(6))	Ex. 5
6	Dolan Patterson	Ex. 6
7	Jacob Shumaker (Fed. R. Civ. P. 30(b)(6))	Ex. 7
8	Jason Larson (Fed. R. Civ. P. 30(b)(6))	Ex. 8 - Being filed separately under seal pursuant to Court procedures; a slip sheet standing in for that filing is attached as Ex. 8
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12 In the designations submitted with this filing, boxes on the right-hand side of the page
 13 indicate where a party has made an affirmative designation, a counter-designation, or has objected
 14 to a designation. Designations, counter-designations, and objections are indicated by a range
 15 showing Page:Line:Word. In cases where a party has objected to a designation, the basis for that
 16 party's objection is listed directly under the range showing the content objected to, and the
 17 responding party's response to the objection is directly below the objection. For example:

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45.1 DES-557
45:16:1-46:13:2
Houlihan Crossclaim

45.2 DES-176
45:16:1-46:13:2
Innovative Affirmative

45.3 DES-1454
45:16:1-46:13:2
Pilgrim Objection to Innovative
ER 401-403 - Relevance, T
hough mindful of the Court'
s MIL rulings which may im
pact this objection, Pilgrim'
s maintains its previously a
sserted position on ground
s separate from the MIL an
d for purposes of FRE 103(
b).
Any prejudice does not sub
stantially outweigh probati
ve value. Goes to Pilgrim's
practices and action regard
ing 584 Chicken, and knowl
edge of problems with 584
Chicken.

16 The first box above shows a Houlihan crossclaim designation. The second box above
17 shows an Innovative affirmative designation. The third box above shows a Pilgrim's objection to
18 an Innovative designation. Each box shows the range of the testimony designated or objected to.
19 Pilgrim's objection are the lines next to and directly below the red dot. Innovative's response to
20 the objection is the language slightly below, beginning, "Any prejudice . . ."

21 The unique "DES-NNN" identifiers in the boxes on the right-hand side of the transcripts
22 are there to assist the parties, and the Court, if needed, in identifying particular designations,
23 counter-designations, and objections. They do not otherwise have any significance.

1 Dated: October 25, 2024.

Respectfully Submitted,

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26 PARTIES' AMENDED DESIGNATED DEPOSITION TRANSCRIPTS - 5
(2:22-CV-00296-JCC)

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CERTIFICATE OF SERVICE

I, Elizabeth H. White, certify under penalty of perjury under the laws of the State of Washington that on October 25, 2024, I caused to be served a true and correct copy of the foregoing document on:

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DATED: October 25, 2024

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